

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	Case No. 4:24CR00026 HEA / JMB
v.	)	
	)	
ANGELIQUE PATTERSON,	)	
	)	
Defendant.	)	

**SENTENCING MEMORANDUM AND REQUEST FOR DOWNWARD VARIANCE**

Angelique Patterson is 40 years old and facing her first felony conviction and first period of incarceration. She is bright, hardworking, and hopes to take advantage of the resources offered by the Bureau of Prisons and the United States Probation Office so that this is her *only* felony conviction and *only* period of incarceration. She comes before the Court requesting a sentence reflecting a downward variance from the guideline range of 37-46 months.

When Ms. Patterson was in high school, she began dating Thomas Gunter. Mr. Gunter physically abused Ms. Patterson throughout their relationship. He slammed her head into a steering wheel, broke into her house, and was incredibly controlling. The impacts of this relationship and the violence she was subjected to have affected Ms. Patterson throughout her life and greatly affected her other relationships.

Additionally, Ms. Patterson has struggled immensely with a gambling addiction. She would frequent casinos multiple times a week, spending hundreds of dollars she did not have each time amounting to thousands of dollars lost. While not offered as an excuse or justification, this disorder has contributed greatly to Ms. Patterson's conduct in this case.

Finally, Ms. Patterson has an overwhelming amount of community support highlighted in the numerous sentencing letters filed with the Court. The letters are from family, friends, co-workers, community leaders, and clergy. It is evident from those letters that she is someone that cares deeply for others and in return those in her circle care deeply for her.

Ms. Patterson looks forward to taking advantage of the resources the Bureau of Prisons and the United States Probation Office has to offer. She hopes to continue her education and vocational training so that she can make full restitution in this case. Given her background and characteristics, she respectfully requests this Court consider a downward variance from the guideline range of 37-46 months.

Respectfully submitted,

/s/Stephanie G. Zipfel

STEPHANIE G. ZIPFEL #66353 MO

Assistant Federal Public Defender

1010 Market Street - Suite 200

St. Louis, Missouri 63101

Telephone 314-241-1255

FAX: 314-421-3177

E-Mail: Stephanie\_Zipfel@fd.org

ATTORNEY FOR DEFENDANT

### **CERTIFICATE OF SERVICE**

I hereby certify that on 01/22/2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Office of the United States Attorney.

/s/ Stephanie G. Zipfel

STEPHANIE G. ZIPFEL